

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors

PROMESA Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

This filing relates to the Commonwealth.

**UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO DEBTOR'S THREE HUNDRED TWENTY-FIRST OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS (Docket No. 16647)**

TO THE HONORABLE COURT:

The Puerto Rico Land Administration, through the undersigned counsel, very respectfully prays for an enlargement of time of twenty (20) days, until June 22, 2021, to responsibly consider and address the objections raised by Debtor in its Three Hundred Twenty-First Omnibus Objection to Claim Nos. 50438 & 73021 of the Puerto Rico Land Administration (the "Claims"), one for \$1,129,811.76 and the other for \$36,386,620.57.

Debtor's objection to the Claims is grounded on the Government Development Bank for Puerto Rico Debt Restructuring Act (the "GDB Restructuring Act") and certain Public Entity Deed of Trust (the "PET Deed"). Appearing party did not have access to the PET Deed. A search was conducted, and the PET Deed had to be obtained by way of a request to brother counsel Gabriel A. Miranda, one of the attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative of the Commonwealth of Puerto Rico, who courteously provided a copy of the same via email.

Having examined the PET Deed, in order to assume a responsible position in connection with the objection in question it is necessary to conduct further research on the matter, consider

additional information in connection with the PET Deed, and confer with third parties. It will not be possible to conclude these tasks prior to the June 2, 2021 deadline.

This request was discussed with counsel for Movant, brother counsel Miranda, who consented to the relief requested herein.

WHEREFORE, **with the consent of Debtor**, it is respectfully requested that this Honorable Court take notice of the aforementioned and that an extension of twenty (20) days, until June 22, 2021, be granted to the Puerto Rico Land Administration to respond to the objection raised by Debtor in its Three Hundred Twenty-First Omnibus Objection. No party opposes the relief requested herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, May 27, 2021.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY: that on this same date, I electronically filed the foregoing Notice with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered participants and attorneys of record.

**S/ CARLOS E. CARDONA-FERNÁNDEZ**

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